

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13CV251 LG JMR

AARON F. BROUSSARD, DANIEL ABEL,
CHARLES LEARY, VAUGHN PERRET,
CHRIS YOUNT, TROUT POINT LODGE
LIMITED, NOVA SCOTIA ENTERPRISES, LLC

DEFENDANTS

MOTION FOR EXTENSION OF TIME
TO BRIEF MOTION TO DISMISS
DEFENDANT DANIEL G. ABEL

COMES NOW Defendant Daniel G. Abel, appearing pro se has moved the Honorable Court to dismiss the complaint removed hereto under FRCP Rule 12, filed by complainant Douglas K. Handshoe against him. Although the state court lacks jurisdiction and is otherwise barred by certain exceptions and affirmative defenses, Abel now requests an extension of time within which to brief the motion to dismiss which he has already filed. Abel seeks leave to file his memorandum in support of his motion to dismiss, on or before the 20th day of July 2013.

The state court where Handshoe originally filed suit lacks subject matter jurisdiction, lacks personal jurisdiction, cannot be vested with venue. Plaintiff Handshoe has no right of action and fails to state a claim upon which relief can be granted.

Defendant Daniel G. Abel again moves this Honorable Court to dismiss the Complaint with prejudice and reserves his right to request costs, fees, and sanctions as are available under Mississippi law and Rule 11 of the Federal and Local rules of this United States District Court.

ORIGINAL

RESPECTFULLY SUBMITTED,

DANIEL ABEL

s/ Daniel G. Abel

LSB No. 8348

CERTIFICATE OF SERVICE

On 13 June 2013, I served a true copy of the Motion to Dismiss to:

Douglas K. Handshoe

214 Corinth Drive

Bay St. Louis, Mississippi 39520

VIA UNITED STATES MAIL AND EMAIL:

earning04@gmail.com

DANIEL G. ABEL

s/ Daniel G. Abel

Daniel G. Abel

2421 Clearview Parkway

Legal Department – Suite 106

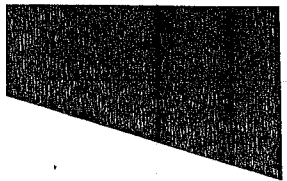
Metairie, LA 70001

Telephone: (504) 208.9610

Facsimile: (888) 577.8815

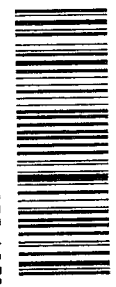
Email: danielpatrickegan@gmail.com

TO: DAVID C. ARSE
2421 CLEARVIEW PKWY
SUITE 106
METairie, LA 70001

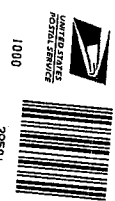


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